

## **REMARKS/ARGUMENTS**

This Amendment is in response to the Office Action dated June 15, 2005. Claims 1-20 are pending in the present application. Claims 1-20 have been rejected. Claim 17 has been amended to correct a typographical error. Claims 1-20 remain pending. For the reasons set forth more fully below, Applicants respectfully submit that the claims as presented are allowable. Consequently, reconsideration, allowance, and passage to issue are respectfully requested.

### **Claim Rejections - 35 U.S.C. §102**

The Examiner has stated:

**Claims 1 and 10 are rejected under 35 U.S.C. 102(b) as being anticipated by McNeely (U.S. Pub. 2002/0162059). Regarding claims 1, and 10, McNeely discloses that a plurality of systems under test (SUTs) ([0015], [0041], i.e. multiple devices under test); at least one server (210) networked to the plurality of SUTs (302); and a local control system (215) coupled to the plurality of SUTs (302) and networked to the at least one server (210; Fig. 4), wherein the at least one server and the local control system utilize a hierarchical definition language with run-time control capability to represent and control a manufacturing process for the plurality of SUTs in a unified manner ([0039-0044], Fig. 6, Page 5-Page 6).**

Applicants respectfully disagree with the Examiner's rejections. The present invention provides a method and system for efficient order processing in a manufacturing environment. In accordance with the present invention, aspects include utilizing a hierarchical definition language with run-time control capability to represent and control a box line manufacturing process of computer systems in a unified manner. Further provided is a state file, the state file including blocks, sub-blocks, tasks, and containers for run-time information of the box line manufacturing process of computer systems. A sequencer tool interacts with the state file to direct tasks of the state file, monitor task completion, and update the state file with real-time control information. A listener tool interacts with the sequencer tool to start tasks, monitor tasks, and send task results

to the sequencer tool. Through the present invention, a hierarchical process definition language with run-time control capability is described for a single file that is a persistent structure that can be stopped and restarted at arbitrary points for representation and control of a unified manufacturing process. McNeely does not teach or suggest these features, as discussed below.

McNeely discloses methods and systems for testing communications network components. A communications network test system facilitates autonomous or attendant-free interaction between the administrative interfaces of multiple network devices under test. The test system includes device-specific communication interface packages that map generic commands to device-specific commands. A generic package includes generic procedures that access the device-specific packages to perform common functions, such as startup and cleanup. Test cases can thus be written using the generic commands without requiring the tester to have knowledge of device-specific demands. In addition, multiple devices can be simultaneously tested and monitored using a single test platform.

#### Independent claim 1

McNeely does not teach or suggest “utilizing a hierarchical definition language with run-time control capability in at least one server and a local control system coupled to a plurality of systems under test (SUTs) to represent and control a box line manufacturing process of computer systems in a unified manner,” as recited in independent claim 1. The Examiner has referred to paragraphs 15 and 41 and element 302 of McNeely as disclosing a plurality of systems under test. However, paragraph 15 merely describes a common interface that allows interaction between “multiple **devices** under test.” Similarly, paragraph 41 merely describes test sequences that

involve interaction “among multiple DUTs” (**devices** under test). Element 302 (Figure 1) of McNeely is a **single system** including multiple devices that may be tested. In contrast to McNeely, referring to Figure 1 of the present invention, the **plurality of systems** under test are multiple computer systems, not multiple devices of a single system as in McNeely.

Therefore, McNeely does not teach or suggest the combination of steps as recited in independent claim 1, and this claim is allowable over McNeely.

#### Independent claim 10

Similar to independent claim 1, independent claim 10 recites “a plurality of systems under test (SUTs),” “wherein the at least one server and the local control system utilize a hierarchical definition language with run-time control capability to represent and control a manufacturing process for the plurality of SUTs in a unified manner.” As described above, with respect to independent claim 1, McNeely does not teach or suggest these features. Accordingly, the above-articulated arguments related to independent claim 1 apply with equal force to claim 10. Therefore, claim 10 is allowable over McNeely for at least the same reasons as claim 1.

#### Claim Rejections - 35 U.S.C. §103

The Examiner has stated:

**Claim 17 is rejected under 35 U.S.C. 103(a) as being unpatentable over Stubbs et al. (U.S. Patent 5,136,705) in view of McNeely (U.S. Pub. 2002/0162059).**

**Stubbs discloses a state file (data flow) including blocks and sub-blocks, tasks, and containers for run-time information (Fig. 2A, Fig. 14, Fig. 22); a sequencer tool for interacting with the state file to direct tasks of the state file, monitor task completion and update the state file with real-time control information**

(column 8, lines 8-11; column 16, lines 4-14); the listener tool for interacting with the sequencer tool to start task, monitor task, and send task results to the sequencer tool (column 5, lines 42-46; column 8, line 38-column 9, lines 4; Fig. 2B, Abstract).

Stubbs fails to disclose Multiple SUTs. However, McNeely discloses Multiple SUTs [0015].

It would have been obvious to a person of ordinary skill in the art at the time of invention was made to modify the teaching of McNeely with the teachings of Stubbs in order to an automated, integrated testing of multiple device in a communications network.

Claims 2-8, 11-15, 18 and 20 are rejected under 35 U.S.C. 103(a) as being unpatentable over McNeely (U.S. Pub. 2002/0162059) in view of Stubbs et al. (U.S. Paand 10, as stated above but McNeely fails to disclose the limitations of claims 2-8 and 11-15. However, Stubbs discloses that the limitations of claims 2-8 and 11-15 as follow: ...

Claims 9, 16 and 19 are rejected under 35 U.S.C. 103(a) as being unpatentable over McNeely (U.S. Pub. 2002/0162059) in view of Stubbs et al. (U.S. Patent 5,136,705) as applied to claims 1, 10 and 17 above, and further in view of Loudon(U.S. Pub. 2003/0208712)...

Applicants respectfully disagree with the Examiner's rejections. Stubbs discloses a method of generating instruction sequences for controlling data flow processes. A computer-controlled test and measurement systems, including resources having multiple states and resources having multiple inputs, are modeled as data flow diagrams of topologically interconnected resources. A set of "tasks" are defined for changing the states of multiple-state resources and causing software resources to produce output data. Methods and apparatus, including internal and external task ordering rules, are provided to automatically interleave such tasks and implement input-ordering restrictions. Thereby, a sequence of tasks is produced to control the systems so as to assure valid data collection and protect physical resources from abuse. Data structures are illustrated for implementing the invention in an object-oriented programming environment.

Independent claim 17

Applicants agree with the Examiner that Stubbs fails to disclose multiple SUTs. As described above, McNeely also fails to disclose multiple SUTs. Therefore, independent claim 17 is allowable over Stubbs in view of McNeely for at least this reason.

Applicants further submit that Stubbs also does not teach or suggest “providing a sequencer tool in a local control station for interacting with the state file to direct tasks of the state file, monitor task completion, and update the state file with real-time control information,” as recited in independent claim 17. The Examiner has referred to column 8, lines 8-11, and column 16, line 4-14, of Stubbs as disclosing the “sequencer tool” as recited in the present invention. However, column 8, lines 8-11, of Stubbs does not describe a sequencer tool and clearly does not describe a sequencer tool that functions to “direct tasks of the state file, monitor task completion, and update the state file with real-time control information” as in the present invention. This section of Stubbs instead describes a “block diagram editor software for creating and editing block diagrams representing data flow.” Column 16, line 4-14, of Stubbs also describes data “defining a block diagram representing a data flow.” Nowhere do these sections mention a sequencer tool that interacts “with the state file to direct tasks of the state file, monitor task completion, and update the state file with real-time control information,” as recited in independent claim 17.

Therefore, Stubbs in view of McNeely does not teach or suggest the combination of steps as recited in independent claim 17, and this claim is allowable over Stubbs in view of McNeely.

Dependent claims

Dependent claims 2-9, 11-16, and 18-20 depend from independent claims 1, 10, and 17, respectively. Accordingly, the above-articulated arguments related to independent claims 1, 10, and 17 apply with equal force to claims 2-9, 11-16, and 18-20, which are thus allowable over the cited references for at least the same reasons as claims 1, 10, and 17.

Conclusion

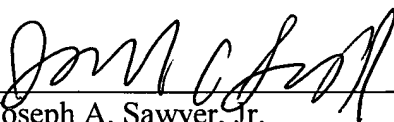
In view of the foregoing, Applicants submit that claims 1-20 are patentable over the cited references. Applicants, therefore, respectfully request reconsideration and allowance of the claims as now presented.

Applicants' attorney believes that this application is in condition for allowance. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

Respectfully submitted,

SAWYER LAW GROUP LLP

September 13, 2005  
Date

  
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